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February 25, 2025

VIA ECF

The Honorable Michael E. Farbiarz
United States District Judge
U.S. District Court for the District of New Jersey
Frank R. Lautenberg U.S. Post Office & Courthouse
2 Federal Square
Newark, N.J. 07102

SO ORDERED.

Michael E. Farbiarz, U.S.D.J

Date: 2/25/2025

Re: <u>United States v. Coburn and Schwartz, 19-cr-120 (MEF)</u>

Dear Judge Farbiarz:

We write on behalf of Defendants Gordon J. Coburn and Steven Schwartz, and with the consent of the government, to respectfully request a one-day adjournment of the deadline for Mr. Coburn to request leave to renew his constructive denial motion. ECF No. 849.

In accordance with Your Honor's Order, the parties are still involved in continued discussions, including the exchange of specific proposals, that may obviate the need for a ruling on Defendants' motion as to the FBI-302s. *See* ECF No. 831. We believe these discussions have been fruitful, and in order to allow them to continue, the parties respectfully request that the deadline set in the Court's Order be extended to tomorrow, February 26, 2025, at 5:00pm.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ James P. Loonam
James P. Loonam

cc: All Counsel of Record (via ECF)